

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CIVIL ACTION NO:
	)	
Plaintiff,	)	JUDGE
	)	
v.	)	
	)	
\$1,117,369.00 IN U.S. CURRENCY;	)	
	)	<u>COMPLAINT IN FORFEITURE</u>
\$390,316.00 IN U.S. CURRENCY;	)	
	)	
\$363,588.00 IN U.S. CURRENCY;	)	
	)	
\$99,864.00 IN U.S. CURRENCY;	)	
	)	
\$48,850.00 IN U.S. CURRENCY;	)	
	)	
\$15,027.00 IN U.S. CURRENCY;	)	
	)	
ASSORTED COIN COLLECTION, NOTES,	)	
GOLD, STAMPS & JEWELRY;	)	
	)	
\$114,714.00 IN U.S. CURRENCY;	)	
	)	
\$239,900.00 IN U.S. CURRENCY;	)	
	)	
\$98,053.00 IN U.S. CURRENCY;	)	
	)	
\$49,000.00 IN U.S. CURRENCY;	)	
	)	
\$5,715.00 IN U.S. CURRENCY;	)	
	)	
ASSORTED SILVER AND GOLD COIN	)	
COLLECTION AND ASSORTED SILVER	)	
BARS;	)	
	)	
MEN'S ROLEX WATCH;	)	

WOMEN'S ROLEX WATCH; )  
)  
)  
\$11,018.00 IN U.S. CURRENCY; )  
)  
)  
\$20,098.00 IN U.S. CURRENCY; )  
)  
)  
\$20,000.00 IN U.S. CURRENCY; )  
)  
)  
ASSORTED COIN COLLECTION; )  
)  
)  
\$8,677.00 IN U.S. CURRENCY; )  
)  
)  
\$14,550.00 IN U.S. CURRENCY; )  
)  
)  
\$1,500.00 IN U.S. CURRENCY; )  
)  
)  
\$13,000.00 IN U.S. CURRENCY; )  
)  
)  
\$5,272.00 IN U.S. CURRENCY; )  
)  
)  
\$4,057.00 IN U.S. CURRENCY; )  
)  
)  
\$6,108.00 IN U.S. CURRENCY; )  
)  
)  
2015 MERCEDES BENZ S550, VIN: )  
WDDUG8FB5FA103038; )  
)  
)  
2017 MERCEDES BENZ GLC, VIN: )  
WDC0G6EB8HF152359; )  
)  
)  
2015 CADILLAC ESCALADE, VIN: )  
1GYS4BKJ8FR151391; )  
)  
)  
2012 MERCEDES BENZ S-Class, VIN: )  
WDDNG9EB6CA449428; )  
)  
)  
REAL PROPERTY LOCATED AT 603 )  
BELLFLOWER AVENUE, CANTON OHIO, )  
PPN: 02-14109; )  
)  
)  
REAL PROPERTY LOCATED AT 5692 )  
FOXCHASE PATH, CLINTON, OHIO PPN: )  
24-13481; and, )  
)  
)

REAL PROPERTY LOCATED AT 2231 )  
DUNKEITH DRIVE NW, CANTON, OHIO )  
PPN: 18-00171. )  
)

Defendants.

NOW COMES plaintiff, the United States of America, by Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Phillip J. Tripi, Assistant U.S. Attorney, and files this Complaint in Forfeiture, alleging on information and belief the following:

**JURISDICTION AND INTRODUCTION**

1. This Court has jurisdiction over this *in rem* proceeding pursuant to 28 U.S.C. §§ 1345 and 1355.
2. This Court has venue in this matter pursuant to 28 U.S.C. § 1395.
3. The following defendant assets were seized from multiple locations in the Akron/Canton, Ohio area on July 11, 2018, by the United States Secret Service and the Internal Revenue Service and are currently in the custody of the federal government:
  - a. \$1,117,369.00 in U.S. Currency;
  - b. \$390,316.00 in U.S. Currency;
  - c. \$363,588.00 in U.S. Currency;
  - d. \$99,864.00 in U.S. Currency;
  - e. \$15,027.00 in U.S. Currency;
  - f. Assorted Coin Collection, Notes, Gold, Stamps & Jewelry;
  - g. \$114,714.00 in U.S. Currency;
  - h. \$239,900.00 in U.S. Currency;
  - i. \$98,053.00 in U.S. Currency;
  - j. \$49,000.00 in U.S. Currency;
  - k. \$5,715.00 in U.S. Currency;
  - l. Assorted Silver and Gold Coin Collection and Assorted Silver Bars;
  - m. Men's Rolex Watch;
  - n. Women's Rolex Watch;
  - o. \$11,018.00 in U.S. Currency;
  - p. \$20,098.00 in U.S. Currency;
  - q. \$20,000.00 in U.S. Currency;
  - r. Assorted Coin Collection;

- s. \$8,677.00 in U.S. Currency;
- t. \$14,550.00 in U.S. Currency;
- u. \$1,500.00 in U.S. Currency;
- v. \$13,000.00 in U.S. Currency;
- w. \$5,272.00 in U.S. Currency;
- x. \$4,057.00 in U.S. Currency; and
- y. \$6,108.00 in U.S. Currency;

4. Subsequent to the seizure, the Internal Revenue Service commenced administrative forfeiture proceedings against the above-described defendant assets. The following claims were made, thereby necessitating the filing of this judicial forfeiture action:

a. On October 3, 2018, Rocco and Trisha Ferruccio filed claims to the following defendant assets:

- 1. \$1,117,369.00 in U.S. Currency;
- 2. \$390,316.00 in U.S. Currency;
- 3. \$363,588.00 in U.S. Currency;
- 4. \$99,864.00 in U.S. Currency;
- 5. \$15,027.00 in U.S. Currency; and,
- 6. Assorted Coin Collection, Notes, Gold, Stamps & Jewelry.

b. On October 11, 2018, Joshua Jay filed a claim to \$180,721.00 of defendant \$1,117,369.00 in U.S. Currency.

c. On October 1, 2018, Todd and Christina DiMichele filed a claim to the defendant \$114,714.00 in U.S. Currency.

d. On October 5, 2018, Christos Karasarides, Jr. (hereinafter "Christos Karasarides") filed claims to the following defendant assets:

- 1. \$239,900.00 in U.S. Currency;
- 2. Assorted Silver and Gold Coin Collection and Assorted Silver Bars; and,
- 3. Men's Rolex Watch.

e. On October 5, 2018, Melissa Bragg filed claims to the following defendant assets:

- 1. \$98,053.00 in U.S. Currency;



2. \$49,000.00 in U.S. Currency;
3. \$5,715.00 in U.S. Currency;
4. \$11,018.00 in U.S. Currency; and,
5. Women's Rolex Watch.

f. On October 5, 2018, Ronald DiPietro filed claims to the following defendant assets:

1. \$20,098.00 in U.S. Currency;
2. Assorted Coin Collection;
3. \$8,677.00 in U.S. Currency; and,
4. \$14,550.00 in U.S. Currency.

g. On October 5, 2018, Tyra Zwick filed a claim to the defendant \$20,000.00 in U.S. Currency.

h. On October 5, 2018, Thomas Helmick filed claims to the following defendant assets:

1. \$1,500.00 in U.S. Currency; and,
2. \$13,000.00 in U.S. Currency.

i. On October 5, 2018, Mary Helmick filed a claim to the defendant \$5,272.00 in U.S. Currency.

j. On October 24, 2018, Nicole Shaheen filed a claim to the defendant \$4,057.00 in U.S. Currency.

k. On October 12, 2018, Marcelle Audi filed a claim to the defendant \$6,108.00 in U.S. Currency.

5. The defendant \$48,850.00 in U.S. Currency was seized on July 20, 2018, in Fort Lauderdale, Florida. The seizure was made by the Internal Revenue Service and is currently in the custody of the federal government.

6. Subsequent to the seizure, the Internal Revenue Service commenced administrative forfeiture proceedings against the defendant \$48,850.00 in U.S. Currency. On

October 3, 2018, a claim to the defendant \$48,850.00 in U.S. Currency was submitted in the administrative forfeiture proceeding by Rocco and Trisha Ferruccio, thereby necessitating the filing of this judicial forfeiture action.

7. Additionally, the complaint names the following motor vehicles as defendant properties:

- a. 2015 Mercedes Benz S550, VIN: WDDUG8FB5FA103038;
- b. 2017 Mercedes Benz GLC, VIN: WDC0G6EB8HF152359;
- c. 2015 Cadillac Escalade, VIN: 1GYS4BKJ8FR151391; and,
- d. 2012 Mercedes Benz S-Class, VIN: WDDNG9EB6CA449428.

8. Additionally, the complaint names the following real properties as defendant properties:

- a. Real Property located at 603 Bellflower Avenue, Canton Ohio, PPN: 02-14109;
- b. Real Property located at 5692 Foxchase Path, Clinton, Ohio, PPN: 24-13481; and,
- c. Real Property located at 2231 Dunkeith Drive NW, Canton, Ohio, PPN: 18-00171.

9. The above-named defendant properties are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 1955(d), because they constitute or are derived from proceeds traceable to a violation of 18 U.S.C. § 1955; and/or are property, including money, used in a violation of 18 U.S.C. § 1955; and/or pursuant to 18 U.S.C. § 981(a)(1)(A) because they were involved in money laundering in violation of 18 U.S.C. §§ 1956 and 1957.

#### **FORFEITURE**

10. Christos Karasarides, Melissa Bragg, Christopher A. Karasarides, Rocco

Ferruccio, Trisha Ferruccio, Todd DiMichele, Christina DiMichele, Thomas Helmick, Nicole Shaheen, Ronald DiPietro, Jason Kachner, Tyra Zwick, and others (hereinafter collectively referred to as “the coconspirators”) are involved in operating illegal gambling businesses located in Stark County, Ohio, and concealment and money laundering of illegal proceeds from those businesses.

11. The coconspirators utilize nominees to conceal the true ownership and management of the illegal gambling businesses and to aid in the concealment from law enforcement of income and assets generated from the operation of those illegal gambling businesses. Often, individuals listed as owners on official paperwork are not truly the owners and the actual owners are not listed on official paperwork.

12. In so doing, the coconspirators engage in financial transactions to conceal the nature, source, location, ownership and control of proceeds generated from the operation of their illegal gambling businesses.

13. Since the operation of their illegal gambling businesses generate large amounts of cash, Christos Karasarides, Melissa Bragg, Christopher A. Karasarides, Rocco Ferruccio, Trisha Ferruccio, Todd DiMichele, Christina DiMichele, Thomas Helmick, Nicole Shaheen, Ronald DiPietro, Jason Kachner, Tyra Zwick, and others hoard significant amounts of cash at various locations, including at their residential properties, their business properties, and in safe deposit boxes to avoid the seizure of the proceeds of their illegal gambling businesses by law enforcement.

14. Through a joint investigation by the Internal Revenue Service, Criminal Investigation (IRS-CI), the U.S. Food & Drug Administration—Office of Criminal Investigations (FDA-OCI), the United States Secret Service (USSS), the Federal Bureau of

Investigations (FBI), the Department of Treasury Office of Inspector General (OIG) and the Ohio Casino Control Commission (OCCC), it was learned that the following establishments, among others, were operating as illegal gambling businesses in Stark County, Ohio, in violation of numerous provisions of the State of Ohio Revised Code at various times between 2013 and 2018:

- “Skilled Games Win Win Win, 777;”
- “Winner’s World,” formerly known as “Myers Lake Skill Games;”
- “West Tuscarawas Skill Games;”
- “Eastbury Bowling Center;”
- “Belden Internet Connection;”
- “Gametastic” also known as “Match Play 777;”
- “Skilled Shamrock;” and
- “Redemption Skill Games 777.”

15. Each of the establishments enumerated in the previous paragraph provided games of chance in the form of slot machines, video slot machines, and/or video poker-type slot games. These machines and games are designed to allow patrons to insert cash into the bill receptor, require the patron to push a button to initiate the slot machine or video poker-type games, and offer cash payouts for certain combinations on the reel or the video gaming device, with cash payouts issued to winning patrons on-site by an employee of the gambling establishment.

16. The illegal gambling businesses named above accommodate a large number of patrons and a high volume of wagered slot plays. Such establishments are cash intensive and extremely profitable. Due to the illegal nature of the businesses, coconspirators typically attempt to shield huge amounts of proceeds from detection by law enforcement through money laundering or by hoarding the cash until it safely can be reintroduced into the American financial system without raising suspicion as to its illegal source.



**F.D. Enterprises, Inc.**

17. Rocco Ferruccio is married to Trisha Ferruccio.

18. Todd DiMichele is married to Christina DiMichele.

19. On July 25, 2005, F.D. Enterprises, Inc. was incorporated. Papers filed with the State of Ohio list Christina DiMichele and Trisha Ferruccio as the incorporators and Todd DiMichele as the statutory agent.

20. Financial records and other documents related to F.D. Enterprises, Inc. are stored at the Ferruccio residence located in Akron, Ohio, and at his business, Liberty Vending, located in Canton, Ohio.

21. Todd DiMichele opened corporate bank accounts in the name of F.D. Enterprises, Inc. at Citizens Bank and Fifth Third Bank.

22. Checks drawn on F.D. Enterprises, Inc. bank accounts are deposited into personal checking accounts that belong to Rocco Ferruccio and Todd DiMichele.

23. Between 2013 and 2017, Todd DiMichele had aggregate earnings of at least \$421,000.00 and Rocco Ferruccio had aggregate earnings of at least \$322,000.00 from F.D. Enterprises, Inc.

**Illegal Gambling Businesses associated with F.D. Enterprises, Inc.**

24. "Skilled Games Win Win Win, 777," located at 3034 Martindale Road NE, Plain Township, Ohio, is an illegal gambling business, providing patrons with slot machines rather than games of skill.

25. In 2013, 2014, and 2015, the skill games permit for Skilled Games Win Win Win 777 was obtained from the township in the business name of F.D. Enterprises and Todd DiMichele was listed as the owner. In 2016, 2017, and 2018, the skill games permit listed J.J.

Vending as owner. J.J. Vending is owned by John L. Jones, a known associate of Rocco Ferruccio.

26. “Winner’s World,” formerly known as “Myers Lake Skill Games,” located 1400 Whipple Avenue, Canton Township, Ohio, is an illegal gambling business, providing patrons with slot machines rather than games of skill.

27. In 2013, 2014, and 2015, the skill games permit for Winner’s World was obtained by Todd DiMichele and F.D. Enterprises. In 2016 until November 2017 the skill games permit was in Todd DiMichele’s name. During these years, payments for the permits were often made by F.D. Enterprises.

28. During this same period of time, “West Tuscarawas Skill Games,” located at 3802 W. Tuscarawas, Canton, Ohio, provided slot machines for illegal gambling, but was closed sometime during or prior to 2018.

29. Todd DiMichele had an ownership interest in West Tuscarawas Skill Games prior to its closure.

30. Rocco Ferruccio stores slot machines and other video gambling machines at his company, Liberty Vending, located in Canton, Ohio.

31. Rocco Ferruccio stores business records for the above-named illegal gambling businesses at his residence and at Liberty Vending, including envelopes containing weekly receipts for expenses incurred at each illegal gambling business for the years 2013 through 2016.

32. The records for this time period demonstrate that deposits into F.D. Enterprises, Inc. bank accounts often match exactly an amount handwritten on the weekly envelopes for the



illegal gambling businesses. An analysis has been done of the records, from which average weekly profits could be determined for each illegal gambling business.

33. Based on the analysis, the average annual profit, at a minimum, for Skilled Games Win Win Win, 777 is \$387,284.04, Winner's World is \$233,443.60, and West Tuscarawas Skill Games is \$267,376.20.

34. Between 2013 and 2017, Todd DiMichele made numerous cash deposits into F.D. Enterprises bank accounts.

**Eastbury Bowling Center Associated With Rocco Ferruccio**

35. Eastbury Bowling Center is located at 3000 Atlantic Blvd NE, Canton, Ohio.

36. Five "Pot-O-Gold" illegal video slot machines are available to patrons of Eastbury Bowling Center.

37. Rocco Ferruccio owns Eastbury Bowling Center and the five video slot machines, as well as the real property in which that business is located.

38. The profits from the video slot machines total \$200 to \$300 daily during the summer, and from \$700 to \$1,000 daily, during the winter.

39. Approximately once a week, Rocco Ferruccio picks up the cash generated by the video slot machines from Eastbury Bowling Center.

40. As supported by an analysis of business records, the illegal gambling businesses affiliated with Todd DiMichele generated more than \$800,000 yearly profit and those affiliated with Rocco Ferruccio generated more than \$1,000,000 yearly profit.

41. In July of 2018, F.D. Enterprises paid a permit/license fee to the City of Canton in the amount of \$5,800.00 related to the operation of 29 skill games. According to the document, F.D. Enterprises, located at 3151 Mahoning Road NE, Canton, Ohio, is associated

with Todd DiMichele. The 29 skill machines are located throughout the City of Canton, which included the Eastbury Bowling Center, which permit further referenced five Pot Of Gold devices to be placed at that location.

42. One of the five applications for the device permits on behalf of the Eastbury Bowling Center location listed the business owner as T. Ferruccio and listed F.D. Enterprise as the owner of the device. That application had originally listed the owner as Todd Dean DiMichele; however, his name was crossed out and replaced with F.D. Enterprise.

43. In August of 1983, Rocco M. Ferruccio registered with the Ohio Secretary of State as the incorporator and registered agent for R. R. & F., Inc., which is a corporation for profit. On the application, the mailing address for Rocco Ferruccio was listed as 401 High SW, Canton, Ohio 44707, which is the mailing address for Rocco Ferruccio's company, Liberty Vending.

44. In March of 2016, R. R. & F., Inc., with an address of 3000 Atlantic Blvd NE, Canton, Ohio 44705, conducted a Fictitious Name Registration of the entity Eastbury Bowling Center with the Ohio Secretary of State. The nature of the business conducted is listed as a bowling alley with an address of 3000 Atlantic Blvd NE, Canton, Ohio 44705. Rocco Ferruccio signed the application for Fictitious Name Registration, providing the address of 3000 Atlantic Blvd NE, Canton, Ohio 44705.

**Illegal Gambling Establishments Associated with Karasarides, Bragg, and DiPietro**

45. Melissa Bragg is married to and resides with Christos Karasarides at 2231 Dunkeith Drive NW, Canton, Ohio 44708.

46. Melissa Bragg is the titled owner and manager of an illegal gambling business named "Belden Internet Connection," located at 4623-4627 Whipple Avenue NW, Canton,

Ohio 44718.

47. Nicole Shaheen worked as an employee at Belden Internet Connection from 2012 to 2018.

48. In July of 2018, Belden Internet Connection provided approximately 40 slot machines with cash payouts to its patrons.

49. Christos Karasarides has an extensive criminal history involving illegal gambling and money laundering, including the following: He was arrested on Money Laundering and Operating a Gambling House charges in 2005 in relation to his operation of an illegal gambling business in Stark County, Ohio, which involved the seizure of slot machines and approximately \$140,000.00 in United States currency; and on April 24, 2014, Christos Karasarides was convicted of Conspiracy to Launder Monetary Instruments, among other charges, in Case No. 5:13CR0103, in the United States District Court for the Northern District of Ohio.

50. In August of 2011, Christos Karasarides hoarded \$18,000 in U.S. currency, 549 silver coins, 10 silver bars, and possessed several computers and various other documents related to his gambling and money laundering violations, at his residence at 2231 Dunkeith Drive NW, Canton, Ohio.

51. In 2011, Melissa Bragg admitted she owned and operated Belden Internet Café, also known as MJB Connection, LLC, Belden Internet Connection and Belden Entertainment; that she had five employees working for her; that she earned about \$100,000 a year from the café; and that the café gave out cash prizes to patrons.

52. In March of 2013, Christos Karasarides and Melissa Bragg had a cash hoard of approximately \$80,000 in U.S. currency at their residence located at 2231 Dunkeith Drive NW, Canton, Ohio.

53. In 2009, Melissa Bragg registered MJB Connection, LLC also known as Belden Internet Connection with the Ohio Secretary of State and it operated as an internet gambling café.

54. In 2013, Belden Internet Connection closed briefly after the Ohio gaming laws changed and made internet gambling cafés illegal.

55. Belden Internet Connection subsequently reopened as a gaming club and utilized approximately 40 slot machines to operate as an illegal gambling business.

56. Thomas Helmick is the nephew of Christos Karasarides.

57. On August 18, 2010, Thomas Helmick filed Articles of Incorporation for TRH Group, LLC with the Ohio Secretary of State. Thomas Helmick is listed as the Statutory Agent for TRH Group, LLC.

58. On February 4, 2011, Thomas Helmick and Christos Karasarides opened a bank account with Huntington National Bank in the name of TRH Group, LLC.

59. Thomas Helmick is listed as the President and CEO of the TRH Group, LLC and Christos Karasarides is listed as a family member on the bank account, for which both have signature authority.

60. On December 15, 2016, Thomas R. Helmick filed Articles of Incorporation for TRH Group, LLC with the Secretary of State for the State of Florida, listing himself as the listed officer of TRH Group, LLC.

61. Thomas Helmick owns and operates an illegal gambling business known as "Redemption Skill Games 777," located at 2824 and 2826 Whipple Avenue NW, Canton, Ohio 44708, the same address that Thomas Helmick lists on paperwork as the address for TRH Group, LLC.



62. On July 11, 2018, Thomas Helmick kept defendants \$13,000.00 in U.S. currency and \$1,500.00 in U.S. currency at his residence, which cash was money generated by TRH Group LLC.

63. Jason Kachner and Rebecca Kachner are married.

64. From at least 2015, through July 11, 2018, Jason Kachner had an ownership interest in and operated two illegal gambling businesses: Redemption Skill Games 777, located at 2824 and 2826 Whipple Avenue NW, Canton, Ohio 44708 and Skilled Shamrock located at 4225 Hills and Dales Road NW, Canton, Ohio 44708.

65. Slot machines were made available for patrons to play with cash at both businesses.

66. On January 11, 2018, Rebecca Kachner rented a locker at the YMCA located at 1421 S. Nickelplate Street, Louisville, Ohio.

67. Between January 11, 2018, and February 21, 2018, Rebecca Kachner concealed a cash hoard of \$241,266.00 in U.S. Currency inside the locker.

68. On July 11, 2018, Redemption Skill Games 777 had approximately 72 slot machines available for illegal gambling and approximately \$22,008.00 in U.S. currency on site, employing approximately nine workers to support the illegal gambling operation.

69. On a weekly basis, Redemption Skill Games 777 generated approximately \$20,000 in proceeds from the illegal gambling operation.

70. On July 11, 2018, Skilled Shamrock had 28 slot machines available for illegal gambling, approximately \$23,243 in U.S. currency on site, and employed approximately seven workers to support the illegal gambling operation.

71. Skilled Shamrock generated over \$6 million in proceeds from illegal gambling

operation during the period 2014 through 2017.

72. Ronald DiPietro is an accountant who has served as a tax return preparer for Christos Karasarides and Melissa Bragg.

73. Tyra Zwick is the known girlfriend of Ronald DiPietro and lives with him at 5692 Fox Chase Path, Clinton, Ohio 44216. That property is in the joint names of Ronald DiPietro and Tyra Zwick.

74. Ronald DiPietro is the owner of "Gametastic" also known as "Match Play 777," located at 4220 12th Street NW, Canton, Ohio 44708 and "Skilled Shamrock" located at 4225 Hills and Dales Road NW, Canton, Ohio 44708. Both establishments are illegal gambling businesses providing slot machines and cash payouts to patrons.

75. Ronald DiPietro stored business records at his office located at 3414 West Tuscarawas Street, Canton, Ohio 44708, including financial information detailing the gross receipts, expenses, net profit, and skim generated at Gametastic and Skilled Shamrock from 2014 through 2018.

76. Between 2014 and 2018, Michael Moneypenny, a known associate of Ronald DiPietro, stored on a computer located at his residence in Norton, Ohio, financial information detailing the gross receipts, expenses, net profit, and skim generated at Skilled Shamrock. Additional records for Skilled Shamrock were stored on a computer in the possession of Ronald DiPietro.

77. Ronald DiPietro along with Christos Karasarides and Jason Kachner, have ownership interest in multiple illegal gambling businesses in Stark County, Ohio.

78. Business records establish that the weekly net proceeds of the illegal gambling activities at Skilled Shamrock for 2012 through January, 2018, were divided in half. One of



the halves of the weekly profit was further divided each week between Ronald DiPietro, who received approximately 66.66% of that amount, and Christos Karasarides, who received approximately 33.33% of that amount. The remaining 50% split of the weekly profit is provided to an unknown coconspirator or coconspirators.

79. As detailed in the business records of Gametastic, also known as Match Play 777, between 2015 and 2017, Ronald DiPietro received approximately 55% of the weekly profits from that illegal gambling business.

80. Between 2014 and 2018, Ronald DiPietro's split of the profits from Skilled Shamrock totaled \$1,166,438.03 and Christo Karasarides' split of the profits was \$583,183.50.

81. Between 2015 and 2017, Ronald DiPietro's split of the profits from Gametastic also known as Match Play 777 was \$954,182.00.

82. Ronald DiPietro received more than \$2,000,000 from two of the illegal gambling businesses. Ronald DiPietro has made numerous cash deposits into his personal account no. x9969 at Citizens Bank (formerly known as Charter One Bank) and personal account no. x9564 at Huntington National Bank, from 2014 through 2018.

#### **Money Laundering of Motor Vehicles and Real Property**

83. Christos Karasarides' and Melissa Bragg's primary source of earnings and income is from their ownership and/or operation of illegal gambling businesses.

84. Christos Karasarides and Melissa Bragg use the vast cash proceeds of their illegal gambling businesses to finance the purchase of two motor vehicles and make payments on their residence, and to pay off their credit card balances. They both engaged in a pattern of laundering the cash proceeds of their illegal activities through financial transactions designed to conceal the illegal source of their income.

85. On April 8, 2015, Melissa Bragg purchased defendant 2015 Cadillac Escalade, VIN: 1GYS4BKJ8FR151391, for \$73,944.29 and financed most of the purchase price with an installment loan numbered x7107 from Huntington National Bank.

86. Melissa Bragg made seven monthly cash payments totaling \$12,800.00 between June 22, 2015 and November 22, 2015.

87. On June 23, 2012, Christos Karasarides purchased defendant 2012 Mercedes-Benz S-Class, VIN WDDNG9EB6CA449428 for \$96,000.75 and financed most of the purchase price with an installment loan numbered x9034 from Huntington National Bank.

88. Monthly payments on the loan were often made with cash. In one instance, numerous small denomination bills were used in making a loan payment of \$1,745.00.

89. Between January of 2013 and March of 2018, Melissa Bragg used five separate credit cards issued by JPMorgan Chase Bank. During this time period, Bragg made payments on the account balances in the aggregate amount of \$443,190.42.

90. During this same time period, Christos Karasarides made cash payments on behalf of Melissa Bragg towards the payment of her credit card balances.

91. Christos Karasarides and Melissa Bragg reside in defendant real property located at 2231 Dunkeith Drive NW, Canton, Ohio PPN: 18-00171.

92. Christos Karasarides purchased the defendant real property in 2009 by land contract and has made payments from income that he and Bragg made from their illegal gambling businesses.

93. While Christos Karasarides was incarcerated for approximately one year on a federal money laundering conviction, Melissa Bragg provided college student Christopher A. Karasarides (son of Christos Karasarides, Jr.) with the funds for the mortgage payments on the

land contract for the defendant real property.

94. In 2015, Melissa Bragg stated that she was making the land contract payments on the defendant real property out of her earnings from Belden Internet Connection.

95. Between 2012 and 2016, Christopher A. Karasarides had cash deposits totaling \$130,269.00 into his PNC Bank personal checking account no. x3611.

96. Ronald DiPietro used funds from his bank account which contained large cash deposits from income derived from illegal gambling businesses and laundered a portion of that money by using funds from Citizens Bank account no. x9969 to purchase assets that he currently owns, thereby concealing the nature, source, location, ownership, and control of the proceeds.

97. Between 2013 and 2017, Ronald DiPietro made substantial cash deposits into his personal and business bank accounts.

98. To conceal the large amounts of cash he derived from his interest in illegal gambling businesses, Ronald DiPietro engaged in the practice of transferring the deposited cash from one bank account to another, occasionally on the same day the initial cash deposit was made.

99. The following accounts were funded in part with the proceeds of the illegal gambling businesses or with comingled moneys which included those proceeds: Citizens Bank account no. x9969 in the name of Ronald DiPietro; Citizens Bank account no. x8349 in the name of R & B Leasing (DiPietro's business), and Citizens Bank account no. x8306, in the name of R & B Leasing.

100. Through transfers between various accounts under his control, Ronald DiPietro comingled the proceeds of the gambling activities with other legitimate funds.

101. Prior to the purchase of a large asset, the transfer amounts from DiPietro's business accounts into his personal account at Citizens Bank (account no. x9969) would increase. DiPietro would then typically purchase an asset, or at least make a large initial down payment, with the funds in his personal account.

102. In April of 2013, DiPietro purchased a pear shaped diamond from Alson Jewelers, Inc. for \$60,000. DiPietro made a \$30,000 cash payment for the diamond.

103. If an asset was not paid off completely at time of purchase, Ronald DiPietro often made frequent high-amount payments in order to satisfy the loans quickly. Ronald DiPietro used cash to make many of these payments.

104. Ronald DiPietro purchased defendant real property located at 5692 Foxchase Path, Clinton, Ohio, PPN: 24-13481, for \$385,000.00 on May 28, 2015.

105. Between January 1, 2015, and the date the property was purchased, Ronald DiPietro made the following aggregate cash deposits into his personal and business accounts: \$46,000 into his personal account no. x9969, \$102,685.00 into R & B Leasing account no. x8349, and \$16,574.00 into R & B Leasing account no. x8306.

106. Cash deposited into account no. x8349 was transferred to account no. x8306, usually on the day of the original deposit or the following day. Immediately before the purchase of the defendant real estate, \$53,000 was transferred from account no. x8306 to account no. x9969.

107. At the closing of the defendant real property, Ronald DiPietro paid \$94,253.85 with funds from account no. x9969.

108. Payments towards the \$285,000.00 mortgage for that same defendant real property were often made in cash, including seven payments made between June 9, 2015, and



July 3, 2017, for an aggregate total of \$31,000.00. In 2018, within three years of the home loan, the mortgage was satisfied.

109. On July 25, 2014, Ronald DiPietro purchased defendant 2015 Mercedes Benz S550, VIN: WDDUG8FB5FA103038 for \$124,824. The funding source for the \$50,000.00 down payment came from account no.x9969 and he obtained a loan from PNC Bank to cover the rest of the purchase price. That lien was satisfied less than a year later, on May 12, 2015.

110. Between March 1, 2015 and the day he purchased the car, July 25, 2014, Ronald DiPietro made cash deposits totaling \$13,000.00 into account no. x9969 and \$57,600.00 into R & B Leasing account no. x8349. The money deposited into account no. x8349 was again immediately transferred to account no. x8306.

111. On July 24, 2015, the day prior to purchasing the defendant motor vehicle, Ronald DiPietro transferred \$30,000.00 from account no. x8306 into account no. x9969.

112. On December 9, 2016, Ronald DiPietro purchased defendant 2017 Mercedes Benz GLC, VIN: WDC0G6EB8HF152359, with a check drawn on account no. x9969 in the amount of \$64,491.88, from Mercedes Benz of Akron to complete the purchase of the vehicle.

113. From January 1, 2016 until the car was purchased on December 9, 2016, Ronald DiPietro deposited \$105,000.00 cash into his personal account no. x9969.

114. On October 12, 2017, Ronald DiPietro purchased defendant 603 Bellflower Ave SW, Canton, OH 44710, PPN: 214109, making a payment that same day to complete the purchase by wiring \$74,003.73 from a Huntington National Bank checking account no. x9564, in the account name of Ronald DiPietro.

115. Between February 14, 2017 and October 12, 2017, multiple cash deposits, in the aggregate amount of \$168,000.00 were made into DiPietro's Huntington checking account no. x9564,

### CONCLUSION

116. In July of 2018, Rocco Ferruccio had amassed large cash hoards from the proceeds of the illegal gambling businesses that he and/or F.D. Enterprise, Inc. acquired and controlled, including defendant \$1,117,369.00 in U.S. Currency at the Ferruccio residence in Akron, Ohio; defendant \$390,316.00 in U.S. Currency at the business address of Ferruccio's company, Liberty Vending; defendant \$363,588.00 in U.S. Currency hidden in a safe deposit box in the name of Rocco and Trisha Ferruccio at First Commonwealth Bank in Canton, Ohio; defendant \$99,864.00 in U.S. Currency hidden in a safe deposit box at PNC Bank in Akron, Ohio, in the names of Rocco and Trisha Ferruccio; defendant \$48,850.00 in U.S. Currency hidden in a safe deposit box at PNC Bank in Ft. Lauderdale, Florida in the names of Rocco and Trisha Ferruccio; defendant \$15,027.00 in U.S. Currency located at the Eastbury Bowling Center; and defendant Assorted Coin Collection, Notes, Gold, Stamps & Jewelry.

117. In July of 2018, Todd DiMichele hoarded defendant \$114,714.00 in U.S. Currency in his safe at his residence in Canton, Ohio.

118. In July of 2018, Christos Karasarides and Melissa Bragg hoarded large amounts of cash from their illegal gambling businesses and purchased jewelry and valuable coins and silver bars from those proceeds, including defendant \$239,900.00 in U.S. Currency in a safe deposit box in the name of Christopher A. Karasarides (son of Christos Karasarides) located at Chase Bank; the following defendant properties seized from the family residence in various locations: \$98,053.00 in U.S. Currency on the top shelf of the master bedroom closet,



\$49,000.00 in U.S. Currency hidden in a shoe box, and \$5,715.00 in U.S. Currency in a desk; defendant \$11,018.00 in U.S. Currency at Belden Internet Connection; defendant Assorted Silver and Gold Coin Collection and Assorted Silver Bars; defendant Men's Rolex Watch, and defendant Women's Rolex Watch.

119. In July of 2018, Ronald DiPietro hoarded the following defendant assets: \$20,098.00 in U.S. Currency in the office of his residence, \$20,000.00 in U.S. Currency in the master bathroom of his residence; Assorted Coin Collection in the office of his residence; \$8,677.00 in U.S. Currency and \$14,550.00 in U.S. Currency at his business address in Canton, Ohio.

120. In July of 2018, Thomas Helmick, hoarded the following currencies: Defendant \$1,500.00 in U.S. Currency and \$13,000.00 in U.S. Currency at two locations at his residence in Canton, Ohio; and defendant \$5,272.00 in U.S. Currency at his mother's address, which is also the listed address for TRH Group LLC.

121. In July of 2018, Nicole Shaheen, an employee at Belden Internet Connection and the sister-in-law of Melissa Bragg, hoarded defendant \$4,057.00 in U.S. Currency at her residence.

122. In July of 2018, defendant \$6,108.00 in U.S. Currency was seized from Winner's World and represented the proceeds of that illegal gambling business which offered video slot machines and cash payouts.

123. The defendant real properties, motor vehicles, and miscellaneous bars, jewelry, and coins were purchased, in whole or in part, with the proceeds of the illegal gambling scheme and/or were involved in money laundering.

124. The defendant currencies are proceeds of the illegal gambling scheme.

125. By reason of the foregoing, the defendant properties are subject to forfeiture to the United States pursuant to the statutory authority set forth in paragraph 9 hereof.

WHEREFORE, plaintiff prays that this Court enter judgment condemning the defendant properties and forfeiting them to the United States of America for disposition according to law, and for such other relief as this Court may deem just and proper.

Respectfully submitted,

Justin E. Herdman  
United States Attorney

By:

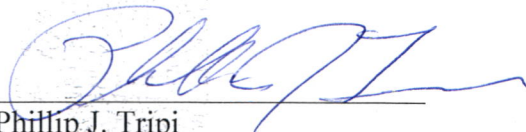


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VERIFICATION

STATE OF OHIO                    )  
  ) SS.  
COUNTY OF CUYAHOGA )

I, Phillip J. Tripi, being first duly sworn, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and one of the attorneys for the Plaintiff in this action. Under penalty of perjury I depose and say the foregoing Complaint in Forfeiture is based upon information officially provided to me and is true as I verily believe.

  
Phillip J. Tripi  
Assistant U.S. Attorney

Sworn to and subscribed in my presence this 20<sup>th</sup> day of December, 2018.

  
Diane Schneider  
Notary Public



DIANE SCHNEIDER  
NOTARY PUBLIC  
STATE OF OHIO  
COMM. EXPIRES  
3-9-22  
RECORDED IN  
CUYAHOGA COUNTY